

EXHIBIT Q

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022

1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CIVIL ACTION NO.
1:16-CV-03088-ELR

STATE OF GEORGIA,

Defendant.

VIDEOTAPED DEPOSITION OF PATRICIA JOANN WOLF

Taken on behalf of the Plaintiff,

pursuant to Notice and agreement of counsel,

in accordance with the Federal Rules of Civil Procedure

before Maxyne Bursky, RPR, CRR, CRC

Certified Court Reporter

At 110 N. ABC Street, Milledgeville, Georgia

On October 6, 2022, between the hours of

9:21 a.m. and 6:07 p.m.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
64

1 Q Is there a particular timeline in which you
2 receive that information?

3 A We usually -- you mean what month out of the
4 year? Typically, it's April or May of each year.
5 Sometimes it varies.

6 Q Do you submit anything to the Georgia
7 Department of Education in advance of receiving that
8 information?

9 A No.

10 Q There's no sort of grant application or
11 anything like that?

12 A Yes, I'm sorry, I didn't realize that's what
13 you were talking about. Yes, we do a grant proposal
14 every year and that's part of our budget package.

15 Q That's submitted to the Georgia Department of
16 Education?

17 A It is.

18 Q Roughly when during the year do you submit
19 that to the Georgia Department of Education?

20 A Approximately in June.

21 Q You said earlier that typically the Georgia
22 Department of Education lets you know in April or May
23 how much money is in your budget. That's the correct
24 timeline?

25 A They give a tentative budget at that time and

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
65

1 then at some point that's approved and we get the
2 actual amounts. I really, I don't know what month, I
3 think it varies from year to year. But generally, June
4 is where we have the final funds and we do the grant
5 proposal and submit all that.

6 Q Just so I'm clear, do you get the tentative
7 amount of money in GNETS of Oconee's budget from the
8 Georgia Department of Education before you submit the
9 grant proposal or after?

10 A Before.

11 Q Then you submit the grant proposal?

12 A Yes.

13 Q And then there is a final allocation that
14 comes out after you submit the grant proposal?

15 A Yes. I'm not sure if it's before or after,
16 but yes. Generally, it's right around the same time.

17 Q Do you have regular meetings with Oconee RESA
18 regarding GNETS of Oconee?

19 A Yes.

20 Q Are those connected to the monthly update that
21 I believe you said you prepared?

22 A With the RESA Board of Control, yes.

23 Q Who attends those meetings?

24 A The superintendents from the six systems we
25 serve as well as Georgia College and Central Georgia

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
100

1 A Typically, with high school students, they are
2 almost solely using the online program with support.
3 So the teacher will take a lesson from Edgenuity and do
4 it as a group, those kind of things.

5 MS. GARDNER: I'd like to have the court
6 reporter mark this document as Plaintiff's
7 Exhibit 469.

8 (Plaintiff's Exhibit 469 was marked for
9 identification.)

10 (Witness reviewing document.)

11 BY MS. GARDNER:

12 Q Ms. Wolf, you have been handed what's been
13 marked as Plaintiff's Exhibit 469. This is an email
14 thread, the most recent email from you to Vickie
15 Cleveland dated September 12, 2019 with the subject
16 "Forward: Funding Ratios," and one attachment that is
17 an Excel spreadsheet with the file name FY20 GNETS of
18 Oconee Funding Ratios as of 9419. This document is
19 Bates stamped GA00952013.

20 Do you recognize this document?

21 (Witness reviewing document.)

22 A I do.

23 Q Am I correct that you sent the Excel
24 spreadsheet attached to this email to Vickie Cleveland
25 in response to a request for information from her; is

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
101

1 that right?

2 A Correct.

3 Q That request was that you provide a
4 spreadsheet showing the number of support staff,
5 teachers and paraprofessionals who are paid with the
6 GNETS state or Federal grant?

7 A Correct.

8 Q She also requested that you indicate whether
9 your social worker is certified as an MSW or LCSW?

10 A Correct.

11 Q Turning to the spreadsheet which appears at
12 the end of this document, does this outline the
13 information that Ms. Cleveland requested as it relates
14 to GNETS of Oconee?

15 A Yes.

16 Q This spreadsheet serves one support staff
17 which is your LCSW that is funded by the State grant
18 and one administrative assistant funded by the Federal
19 grant; is that correct?

20 A Correct.

21 Q Do you still have an LCSW funded by the State
22 grant?

23 A Yes.

24 Q Just one?

25 A Yes.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
102

1 Q Do you still have an admin assistant funded by
2 the Federal grant?

3 A Yes.

4 Q Just one?

5 A Yes.

6 Q Do you currently have any other support staff
7 apart from those two funded by the State or Federal
8 grant?

9 A The contracted licensed professional
10 counselor, and that's indicated under there, Number of
11 behavior coaches.

12 Q At the time of this spreadsheet, did you have
13 any support staff funded by any of the LEAs that GNETS
14 of Oconee serves?

15 A No.

16 Q Do you have any support staff funded by those
17 LEAs currently?

18 A No.

19 Q This chart also shows how many teachers you
20 had who were funded by the State or Federal grant,
21 correct?

22 A Yes.

23 Q This shows ten teachers total?

24 A That's correct.

25 Q All of those teachers were funded by the State

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
103

1 grant; is that right?

2 A Yes.

3 Q Did you have any teachers at the time this
4 information was submitted who were funded by the LEAs
5 that GNETS of Oconee serves?

6 A No.

7 Q Do you currently have any teachers funded by
8 those LEAs?

9 A No.

10 Q Do you still have ten teachers total?

11 A Yes.

12 Q Are all ten still funded by the State grant?

13 A Yes.

14 Q Finally, this chart shows how many
15 paraprofessionals you had that were funded by the State
16 or Federal grant, right?

17 A Yes.

18 Q The chart shows twelve paraprofessionals
19 total; is that correct?

20 A Correct.

21 Q Nine of those were funded by the Federal grant
22 and three were funded by the State grant?

23 A Yes.

24 Q At the time you submitted this information,
25 did you have any paraprofessionals who were funded by

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
104

1 the LEAs that GNETS of Oconee serves?

2 A No.

3 Q Do you currently have any paraprofessionals
4 who are funded by those LEAs?

5 A No.

6 Q Do you still have twelve paraprofessionals?

7 A I think we have 13 paraprofessionals now in
8 this staffing pattern, but then, like we talked about
9 earlier, the vacancies.

10 Q I believe you said you have five or six
11 vacancies; is that correct?

12 A Yes.

13 Q Is the breakdown roughly the same in terms of
14 the number of your paraprofessionals whose funding
15 comes from the State grant relative to the Federal
16 grant?

17 A It is.

18 Q What about your profession as director, it is
19 not listed in this chart. How is your position funded?

20 A My position is funded through the State grant.

21 MS. GARDNER: I'd like to have the court
22 reporter mark this document as Plaintiff's
23 Exhibit 470.

24 (Plaintiff's Exhibit 470 was marked for
25 identification.)

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022

105

1 (Witness reviewing document.)

2 BY MS. GARDNER:

3 Q Ms. Wolf, you have been handed what's been
4 marked as Plaintiff's Exhibit 470. This is a
5 non-Bates-stamped document. At the top of the document
6 it says Grants Information, Fiscal Year 2022, System
7 Name, 866 - Oconee RESA; name, GNETS; status, program
8 manager, signed off. Do you recognize this document?

9 A I do.

10 Q What is this document?

11 A This is our grant proposal.

12 Q Is this the grant proposal for GNETS of Oconee
13 for fiscal year '22?

14 A It is.

15 Q I'd like to direct your attention to Page 4 of
16 this document, the fourth page in. At the top it says
17 staffing pattern. Do you see that?

18 A I do.

19 Q We just discussed this, but correct that this
20 reflects the discussion that there are no staff
21 positions at GNETS of Oconee for FY22 funded by the
22 LEAs?

23 A Correct.

24 Q This indicates that there are 15 staff
25 positions at GNETS of Oconee funded by the State grant;

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
106

1 is that right?

2 A Correct.

3 Q And that there are four staff positions funded
4 by the Federal grant?

5 A Correct.

6 Q If you then look at the 7th page from the
7 back. I'm sorry, these pages are also not numbered.

8 A Okay.

9 Q Do you see the section that says Service
10 Delivery Supplemental Instruction?

11 A Yes.

12 Q If you flip over one more page from that to
13 the second page of that section, there's a question in
14 the middle of this page, it says, "How is academic data
15 being used by leadership to support students, staff and
16 parents?"

17 Do you see that question?

18 A Yes.

19 Q Towards the end of the first sentence there it
20 says, "Data is analyzed for progress on IEP goals as
21 well as progress in academic grade level standards."

22 Do you see that?

23 A I'm not sure where you are -- yes, okay.

24 Q How does GNETS of Oconee ensure that the
25 curriculum is aligned both with general education grade

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
141

1 mark this document as Plaintiff's Exhibit 478.

2 (Plaintiff's Exhibit 478 was marked for
3 identification.)

4 (Witness reviewing document.)

5 BY MS. GARDNER:

6 Q Ms. Wolf, you have been handed what has been
7 marked as Plaintiff's Exhibit 478. This is an email
8 thread between you and Vickie Cleveland. The most
9 recent email in this thread is from Vickie Cleveland to
10 you dated June 13, 2018. The subject line is "Re:
11 Social Workers."

12 Do you recognize this email?

13 A I don't recall this email, but I recognize it
14 as mine, yes.

15 Q If you could turn to the first email in time
16 in the thread which begins on the second page of this
17 document.

18 A (Indicating affirmatively.)

19 Q Am I correct in understanding from this that
20 Vickie Cleveland reached out to you and Desiree Woods
21 to ask whether the two of you shared a social worker
22 for the FY18 school year?

23 A Yes.

24 Q Who is Desiree Woods?

25 A A fellow GNETS director now retired.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
142

1 Q Which program was she the GNETS director for?

2 A DeKalb Rockdale.

3 Q Ms. Cleveland also asked the two of you
4 whether you will still need a reimbursement for the
5 social worker for FY19, correct?

6 A Correct.

7 Q How did you respond to Ms. Cleveland's
8 question?

9 A I would have said that, yes, we did need
10 additional therapeutic support funding.

11 Q So in your email responding to Ms. Cleveland,
12 you say, "We definitely need an extra therapeutic
13 support person."

14 Is that correct?

15 A Yes.

16 Q You go on to say, "Can we find our own people,
17 though, and not use Staff Rehab or another agency?"

18 Do you see that?

19 A Yes.

20 Q What's Staff Rehab?

21 A Staff Rehab was a privately run therapeutic
22 agency that would provide support to school systems.

23 Q Had you been required to use Staff Rehab
24 before?

25 A Initially, I don't know that it was a

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
143

1 requirement, but I can't remember how Staff Rehab
2 became involved. That's what we were told to refer
3 through initially, but they really didn't know a lot --
4 I can't remember if it was an individual person. I
5 can't remember the person at all.

6 But I remember that they weren't really
7 trained in how to work with our population. And that's
8 why I was asking.

9 Q You said Staff Rehab is what you were told to
10 refer through initially. Who told you to refer through
11 Staff Rehab initially?

12 A I don't know that Vickie told us that we had
13 to use Staff Rehab. I think that was one of the
14 resources that she suggested. And Ms. Woods had used
15 them in the past as well, so I don't know if other
16 GNETS programs use that same agency or not. I know it
17 wasn't working out with us.

18 Q In here you are asking Vickie Cleveland
19 whether you can not go that route and can instead find
20 your own person?

21 A Correct.

22 Q What was the outcome of that question? How
23 did that get resolved?

24 A I believe that we were able to, that we were
25 allowed to. I don't know if she had emailed me back or

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022

144

1 we had a phone conversation, but the answer was yes,
2 essentially.

3 Q You mentioned that one of the issues with
4 Staff Rehab was that they weren't really experienced in
5 working with your population?

6 A Yes.

7 Q When you say your population, what
8 specifically are you referring to?

9 A Students with the most severe behavior and
10 emotional needs. They weren't at the level that they
11 would be able to handle a crisis or even do crisis
12 intervention with them, so.

13 MS. GARDNER: I ask the court reporter to mark
14 this document as Plaintiff's Exhibit 479.

15 (Plaintiff's Exhibit 479 was marked for
16 identification.)

17 (Witness reviewing document.)

18 BY MS. GARDNER:

19 Q You have been handed what has been marked as
20 Plaintiff's Exhibit 479. This is another email thread
21 between you and Vickie Cleveland. The most recent
22 email on this thread is an email from Vickie Cleveland
23 to you dated July 24, 2018. The subject is "Re:
24 Therapeutic Services Reimbursement for Social Workers,"
25 and there is one attachment which is a Word document

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022

145

1 with the file name GNETS Contracted Social Worker.

2 The first page of this document has a Bates
3 stamp of GA00329465. Do you recognize this email
4 thread?

5 A I recognize it as being mine. I don't
6 particularly remember it, but yes.

7 Q I want to look at the earliest email in this
8 thread which starts on the second page. Do you see
9 where Ms. Cleveland writes to you and others and says,
10 "The SBOE approved the reimbursements for therapeutic
11 services for social workers for FY19"?

12 A Yes.

13 Q This is the same social worker you were
14 discussing with Ms. Cleveland in the last email
15 exchange we reviewed in Plaintiff's Exhibit 478?

16 A I'm not sure if it's the same one.

17 Q Am I correct that SBOE here refers to the
18 State Board of Education?

19 A Yes.

20 Q Ms. Cleveland goes on to write later on, "I am
21 working on data collection deliverables that the SWs
22 will have to send to GaDOE quarterly regarding services
23 this school year."

24 Do you see that?

25 A Yes.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
146

1 Q Was the social worker the Georgia Department
2 of Education reimbursed you for required to submit data
3 to the Department of Education about services that the
4 social worker provided?

5 A Yes.

6 Q What kind of data were they required to
7 submit?

8 A They were required to submit a therapeutic
9 services log that indicated the date, the student name
10 and the type of service that was provided and, yes, and
11 who they were.

12 Q How frequently was that data required to be
13 submitted?

14 A Monthly.

15 Q To whom was the data submitted at the
16 department in the Georgia Department of Education?

17 A To Lakeisha Stevenson, who was the assistant
18 for Vickie Cleveland.

19 Q When that data was submitted, who from GNETS
20 of Oconee would actually do the submission?

21 A I would do the submission.

22 Q Would you email that, was there some sort of
23 secure way of transmitting it? How did that work?

24 A We submitted it through the Department of
25 Education's secure porthole by email.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
147

1 Q Does GNETS of Oconee still submit that sort of
2 data to the Department of Education today?

3 A Yes.

4 Q For which positions on your staff do you
5 submit that data currently?

6 A Primarily from Ms. Brundage, the licensed
7 clinical social worker.

8 Q Do you still submit that data to Ms.
9 Stevenson?

10 A Yes.

11 Q On a monthly basis?

12 A Yes.

13 Q Turning back to the first page of the document
14 which is your response to Ms. Cleveland, you say here,
15 "Are there any protocols about who we contract with?
16 Can we contract directly with a licensed individual
17 rather than using a hiring agency?"

18 Do you see that?

19 A Yes.

20 Q This question is similar in nature to your
21 question about whether you have to use Staff Rehab; is
22 that right?

23 A Yes.

24 Q How did Ms. Cleveland respond to your
25 question?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
148

1 A I don't recall whether she responded in a
2 written fashion, but the answer was yes, that we could
3 use another agency.

4 Q Ms. Cleveland sends you an email in response
5 to your email on this thread, correct?

6 A Yes.

7 Q She says, "Please send me the resume for the
8 candidate. I have also attached a draft of the social
9 worker responsibilities that I am working on with some
10 of the expectations for services."

11 Correct?

12 A Correct.

13 Q Did you send Ms. Cleveland a resume for the
14 candidate?

15 A I believe so, but as I'm thinking about it,
16 I'm not even sure what the candidate's name was.

17 Q Did you review the draft of the social worker
18 responsibilities that Ms. Cleveland forwarded to you in
19 this email?

20 A Yes.

21 Q What did you do with that draft, if anything?

22 A I believe from the draft, created the job
23 description for that social worker.

24 Q When you say for that social worker, you are
25 talking about the social worker that GNETS of Oconee

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
149

1 ultimately hired?

2 A Yes.

3 Q Ms. Cleveland says in her email that she will
4 share more at an August meeting.

5 Do you see that?

6 A Yes.

7 Q Were these social worker responsibilities
8 discussed at an August meeting?

9 A I don't recall.

10 Q Turning to the attachment that Ms. Cleveland
11 included in her email to you, do you see the section
12 titled General Responsibilities?

13 A Yes.

14 Q In the second paragraph about midway through
15 it says, "Further, the social worker aligns their daily
16 tasks with the identified needs outlined in the GNETS
17 needs assessment submitted to GaDOE. Daily assignments
18 must focus on assisting students with problem solving,
19 conflict resolution and elevated mental health
20 concerns."

21 Do you see that?

22 A Yes.

23 Q Is the needs assessment mentioned here the
24 kind of needs assessment that we reviewed earlier?

25 A I believe so.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
170

1 referred to GNETS of Oconee?

2 A So initially in terms of the special ed
3 continuum, this would be a student that they tried in
4 the general education environment and the student had
5 behavior problems so they would move to a perhaps
6 resource setting followed by a self-contained setting
7 and still have significant behavioral difficulties and
8 challenges. And at that point the IEP team would
9 complete a consideration of services for GNETS.

10 They would convene a team meeting and we would
11 discuss it, whether that is appropriate for that
12 particular student, and if so, at that point decide, do
13 we want to consider other services for that student or
14 consider a part-time placement or a full-time
15 placement.

16 Generally, it's a full-time placement based on
17 the severity of the behaviors which are typically the
18 reasons that kids are being referred to us.

19 MS. GARDNER: I'd like to ask the court
20 reporter to mark this as Plaintiff's Exhibit 482.

21 (Plaintiff's Exhibit 482 was marked for
22 identification.)

23 (Witness reviewing document.)

24 BY MS. GARDNER:

25 Q Ms. Wolf, you have been handed what's been

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
171

1 marked as Plaintiff's Exhibit 482. This is the Georgia
2 Network for Educational and Therapeutic Support
3 confidential student information packet. Do you
4 recognize this document?

5 A I do.

6 Q I believe earlier in discussing the referral
7 process you mentioned a consideration of services
8 packet, is that how you referred to it?

9 A Yes.

10 Q Is this a part of that?

11 A Yes.

12 Q Is this document what you were referring to?

13 A Yes.

14 Q Did you create this document?

15 A Yes, I, along with several directors, created
16 it.

17 Q How is this document used?

18 A This is the document that the referring
19 parties would fill out providing information on the
20 student along with their progress monitoring and
21 assessment information and so forth and they would
22 provide that when considering GNETS services.

23 Q This document on the first page says, "Please
24 review the guiding questions for consideration of GNETS
25 services as well as the GNETS services flow chart to

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
172

1 assist in appropriate educational planning for the
2 student."

3 Do you see that?

4 A Yes.

5 Q Are you familiar with the guiding questions
6 for consideration of GNETS services?

7 A Yes.

8 Q What is that?

9 A So the guiding questions are, you want to make
10 sure that students aren't referred, for example,
11 without a behavior intervention plan and/or functional
12 behavior assessment. So that's one of the guiding
13 questions whether they have had a psychological
14 evaluation within three years, and whether there have
15 been less restrictive interventions tried.

16 So those are all, it is a pretty extensive
17 document. The guiding questions is more, it's like a
18 four or five-page document that has considerations of
19 what the team should consider prior to referring the
20 student to us. And the flow chart itself just kind of
21 shows the whole procedural aspect.

22 MS. GARDNER: I would like to have this
23 document marked as Plaintiff's Exhibit 483.

24 (Plaintiff's Exhibit 483 was marked for
25 identification.)

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
173

1 (Witness reviewing document.)

2 BY MS. GARDNER:

3 Q Ms. Wolf, you have been handed what's been
4 marked as Plaintiff's Exhibit 483. This is the Georgia
5 Network for Educational and Therapeutic Supports
6 guiding questions for consideration of GNETS services.
7 Do you recognize this document?

8 A Yes, I do.

9 Q Is this the guiding questions we were just
10 discussing?

11 A Yes.

12 Q Did you create this document?

13 A Yes, along with several other directors.

14 Q You mentioned before, I believe, that the
15 guiding questions were intended to ensure that certain
16 things are in place before a student is referred for
17 consideration of GNETS services; is that accurate?

18 A That's accurate.

19 Q I believe one of the things you said that the
20 guiding questions is intended to help with is to ensure
21 that students are not referred without a behavior
22 intervention plan?

23 A Correct.

24 Q Why can a student not be referred without a
25 behavior intervention plan?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
174

1 A Because you would hope that the IEP team, if
2 the behaviors were that significant, that they would
3 complete a behavior intervention plan to try to put
4 those supports and interventions in place prior to a
5 student being referred to GNETS.

6 Q Is there any rule that requires that?

7 A I believe the Department of Education GNETS
8 rule requires the behavior intervention plan.

9 Q What is the Department of Education's GNETS
10 rule?

11 A It is a rule that the State Department of
12 Education came up with regarding GNETS that we are
13 guided by.

14 Q You mentioned before that the guiding
15 questions were also intended to help ensure that
16 students were not referred without a functional
17 behavior assessment; is that right?

18 A Yes, but in some cases a functional behavior
19 assessment hasn't been done and just the behavior
20 intervention plan.

21 Q So you are saying that sometimes students are
22 referred to GNETS and there has not been a functional
23 behavior assessment but there has been a behavior
24 intervention plan?

25 A Correct.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
175

1 Q I believe you also referenced a psychological
2 evaluation within three years?

3 A Yes.

4 Q Is that a requirement for placement in GNETS?

5 A Yes, I believe it's part of the rule as well.

6 Q Part of the State rule?

7 A Yes.

8 Q This guiding questions document asks whether
9 the student is currently being served in special
10 education.

11 Do you see that?

12 A Yes.

13 Q It says, "If the answer is no, then GNETS is
14 not an appropriate consideration at this time."

15 Do you see that?

16 A Yes.

17 Q Is current service in special education a
18 requirement for placement in the GNETS program?

19 A Yes.

20 Q Where does that requirement come from?

21 A I believe it's -- I'm not sure if it's in the
22 State rule. I'm not sure where it comes from.

23 MS. GARDNER: I'd like to have this document
24 marked as Plaintiff's Exhibit 484.

25 (Plaintiff's Exhibit 484 was marked for

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
185

1 THE VIDEOGRAPHER: We are back on the record
2 at 3:13 p.m.

3 BY MS. GARDNER:

4 Q So we were discussing referral of students for
5 GNETS services and we looked at the confidential
6 student information packet and the guiding questions
7 and the GNETS services flow chart and the request for
8 consultation, correct?

9 A Yes.

10 Q You mentioned that you helped put those
11 documents together with some other GNETS directors; is
12 that right?

13 A That's correct.

14 Q Was there some sort of a committee to develop
15 those documents?

16 A There was.

17 Q What was the process leading to that committee
18 being formed?

19 A If I recall, the directors felt they needed to
20 have a uniform consideration packet and make sure that
21 all of us are using the same criteria for a student
22 being admitted into GNETS.

23 Q So in terms of the formation of the committee,
24 how did that work?

25 A I believe we just talked about it as

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
186

1 directors. I remember Vickie Cleveland was in the
2 room.

3 I volunteered to help with it because I like
4 to do that kind of stuff, and there's a couple other
5 directors that worked with me. We drafted it several
6 times, sent it out several times and that's how we
7 developed it.

8 Q Who else was on the committee with you?

9 A Whitney Braddock, Steve Derr. I am trying to
10 think was there anyone else besides us. Those are the
11 only two that I remember. I think there was one or two
12 others.

13 Q Was this an iterative process in the sense
14 that you all developed various drafts and they may have
15 been reviewed and edited as you were developing the
16 final documents?

17 A Yes.

18 Q Was there any participation in the process by
19 the GNETS program manager at the Department of
20 Education?

21 A Only in that we reviewed it and gave feedback
22 and she did participate in some of that, some of those
23 discussions, I think. I remember presenting, I
24 remember her asking me to present the final drafts to
25 the rest of the committee, so.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
187

1 Q When you say present the final drafts to the
2 rest of the committee --

3 A I mean the rest of the directors. That's what
4 I meant. Sorry.

5 Q Understood.

6 MS. GARDNER: I would like to have the court
7 reporter mark this document as Plaintiff's
8 Exhibit 486.

9 (Plaintiff's Exhibit 486 was marked for
10 identification.)

11 (Witness reviewing document.)

12 BY MS. GARDNER:

13 Q Ms. Wolf, you have been handed what's been
14 marked as Plaintiff's Exhibit 486. This is an email
15 from you to Steve Derr, Whitney Braddock with a cc to
16 Nakeba Rahming dated September 26, 2017.

17 The subject is Consideration of Services and
18 there are three attachments to the email, the GNETS
19 Confidential Student Information Packet, the GNETS
20 Services Flow Chart and Guidance for GNETS Placements.
21 The first page of this document has a Bates stamp
22 GA00793042.

23 Do you recognize this email?

24 A I do.

25 Q I believe you said earlier that Steve Derr and

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
188

1 Whitney Braddock were the other members on the
2 committee with you to develop the consideration of
3 services documents?

4 A Yes.

5 Q Is it fair if I refer to these documents as
6 consideration of services documents?

7 A Sure.

8 Q Will you understand what I mean?

9 A I will.

10 Q In this email, you write to Ms. Braddock and
11 Mr. Derr and you say, "Thanks for being here today. So
12 just to recap, Nakeba wants us to take the attached
13 documents and make sure that they are aligned with the
14 new GNETS rule which can be found at," and you include
15 a link presumably to the new GNETS State rule; is that
16 right?

17 A Yes.

18 Q Did you send this email following a meeting
19 with Ms. Braddock and Mr. Derr?

20 A Yes.

21 Q That was a meeting to discuss the
22 consideration of services documents?

23 A I believe so, yes.

24 Q Did Ms. Rahming participate in that meeting?

25 A I think she did. I think we were in a

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
189

1 directors' meeting and we discussed it and Whitney,
2 Steve and I volunteered to work on that packet. I
3 think that's how it all came about.

4 Q What did it mean for you to make sure the
5 documents were aligned with the new GNETS rule?

6 A Because of the specifics in the rule about
7 having a behavior intervention plan and the
8 psychological within three years, things like that.

9 Q So Ms. Rahming wanted to make sure that the
10 documents you all were drafting would include or be
11 consistent with the terms of that rule?

12 A Correct.

13 Q Did you all do that?

14 A We did.

15 Q So the consideration of services documents
16 that we have looked at earlier are all aligned with the
17 GNETS state rule?

18 A Yes.

19 Q In this email, you also say a bit farther
20 down, "Nakeba will send out her draft of the guidance
21 document."

22 Do you see that?

23 A Yes.

24 Q What is the guidance document that you are
25 saying Ms. Rahming will send out?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
190

1 A I don't know what that document was.

2 MS. GARDNER: I'd like to have this marked as
3 Plaintiff's Exhibit 487.

4 (Plaintiff's Exhibit 487 was marked for
5 identification.)

6 (Witness reviewing document.)

7 BY MS. GARDNER:

8 Q Ms. Wolf, you have been handed what's been
9 marked as Plaintiff's Exhibit 487. This is an email
10 from you to Nakeba Rahming with a cc to Steve Derr and
11 Whitney Braddock. The subject is Consideration for
12 Services.

13 The email was sent on October 4, 2017 and it
14 attaches several documents, a draft GNETS confidential
15 student information packet, a draft GNETS request for
16 consultation, a draft GNETS services flow chart and a
17 draft guidance for GNETS placements. The Bates stamp
18 on the first page of this document is GA00794159.

19 Do you recognize this document?

20 (Witness reviewing document.)

21 A Yes.

22 Q By the time of this email, had you insured
23 that the consideration of services documents were
24 aligned to the GNETS State rule?

25 A Yes.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
191

1 Q In this email you are asking for Ms. Rahming's
2 permission to send the documents to other GNETS
3 directors for their review and feedback?

4 A Yes.

5 Q Did you receive the green light from Ms.
6 Rahming to do that?

7 A I did.

8 MS. GARDNER: Let's have this document marked
9 as Plaintiff's Exhibit 488.

10 (Plaintiff's Exhibit 488 was marked for
11 identification.)

12 (Witness reviewing document.)

13 BY MS. GARDNER:

14 Q Ms. Wolf, you have been handed Plaintiff's
15 Exhibit 488. This is an email from you to a large
16 email distribution list sent on October 4, 2017. The
17 subject is Consideration for GNETS Services - Draft of
18 Forms.

19 The email has several attachments including a
20 draft GNETS confidential student information packet, a
21 draft GNETS request for consultation, a draft GNETS
22 services flow chart, and a draft guidance for GNETS
23 placements. The Bates stamp on this is GA00794197.

24 Do you recognize this document?

25 A I do.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
192

1 Q Is this a copy of the email where you
2 distributed the consideration of services forms to the
3 GNETS directors for their review and feedback?

4 A Yes.

5 Q This email references a webinar to train staff
6 on the use of the documents. Do you see that?

7 A Yes.

8 Q Did that webinar occur?

9 A No, I remember doing it at a face-to-face
10 directors' meeting shortly after but I don't remember
11 the exact date.

12 MS. GARDNER: Let's have this document marked
13 as Plaintiff's Exhibit 489.

14 (Plaintiff's Exhibit 489 was marked for
15 identification.)

16 (Witness reviewing document.)

17 BY MS. GARDNER:

18 Q Ms. Wolf, you have been handed what's been
19 marked as Plaintiff's Exhibit 489. This is an email
20 thread between you and Nakeba Rahming. The most recent
21 email is sent from you to Ms. Rahming on October 24,
22 2017 with the subject "Re: Consideration for GNETS
23 Services Meeting today at one p.m." The Bates stamp on
24 the initial page is GA00132036.

25 If you turn to the last page to the first in

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
193

1 time email, do you see your email to Ms. Rahming on
2 October 24, 2017 at 8:32 a.m. where you say, "Good
3 morning, Nakeba. Are you planning to be online today
4 for the meeting at one p.m. on the Consideration of
5 Services? If not, please let me know what I should
6 tell Directors regarding implementation of these forms.
7 Are they to be implemented immediately, in January or
8 in FY19? I'm sure this question will come up."

9 Do you see that?

10 A Yes.

11 Q So there was a meeting that was going to be
12 occurring on the consideration of services form?

13 A Yes.

14 Q Was that meeting with other GNETS directors?

15 A Yes.

16 Q Here you are reaching out to Ms. Rahming to
17 get clarity about when other GNETS directors should
18 start using the consideration of services forms; is
19 that correct?

20 A Yes.

21 Q Ms. Rahming responds to your email and says,
22 "Yes, I will be on. We can begin implementation at the
23 beginning of a new school year."

24 Do you see that?

25 A Yes.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
194

1 Q Did she participate in that meeting?

2 A Yes.

3 Q Were those consideration of services forms
4 implemented at the beginning of a new school year?

5 A Yes.

6 Q By beginning of a new school year, is that a
7 reference to the 2018-2019 school year?

8 A Yes.

9 MS. GARDNER: I'd like to have this document
10 marked as Plaintiff's Exhibit 490.

11 (Plaintiff's Exhibit 490 was marked for
12 identification.)

13 (Witness reviewing document.)

14 BY MS. GARDNER:

15 Q Ms. Wolf, you have been handed what's been
16 marked as Plaintiff's Exhibit 490. This is an email
17 from you to Nakeba Rahming dated November 7, 2017. The
18 subject is "Re: Upcoming LEA collaborative meeting for
19 GNETS December 7th," and this email attaches the
20 consideration of services forms. The beginning Bates
21 stamp on this document is GA01941385.

22 Do you recognize this document?

23 A Yes.

24 Q You note in your email to Ms. Rahming that the
25 documents you attach are the final documents and you

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
195

1 ask her if she can have them printed for the
2 participants of the collaborative; is that correct?

3 A Yes.

4 Q What is the collaborative referenced here?

5 A That's all the directors meeting together.

6 Q All of the GNETS directors?

7 A GNETS directors, yes.

8 Q Is that the same as the LEA collaborative
9 meeting that's referenced in the subject line of this
10 email?

11 A Okay, no, that was a meeting that we had the
12 LEAs present where we all came together as the State in
13 Macon. So that's what that collaborative is.

14 Q So this collaborative meeting involved LEAs
15 and GNETS directors?

16 A Yes.

17 Q Did Ms. Rahming participate in that LEA
18 collaborative meeting?

19 A She did.

20 Q If you turn to the second page, do you see the
21 email at the bottom from Matt Jones sent on November 6,
22 2017?

23 A Yes.

24 Q That email was sent to K12 superintendents and
25 RESA directors with a copy to Nakeba Rahming; is that

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
196

1 correct?

2 A Yes.

3 Q In the email Mr. Jones says, "Attached is an
4 agenda for a 2018 fall LEA collaborative meeting held
5 on December 7, 2017 from 9:30 a.m. to 1 p.m. at the
6 Marriott Macon City Center," and then it has the
7 address. Mr. Jones goes on to say, "The purpose of
8 this meeting is to introduce the guidance for the GNETS
9 rule, share a streamlined process with LEAs when they
10 are considering students for GNETS services, and engage
11 GNETS and LEAs in a discussion to plan five regional
12 parent university sessions across the State."

13 Do you see that?

14 A I do.

15 Q So these were the things that were going to be
16 covered at the LEA collaborative meeting that you were
17 forwarding final consideration of services documents
18 forms for?

19 A Yes.

20 Q Did you attend that meeting?

21 A Yes.

22 Q Who is Matt Jones?

23 A The chief of staff of the Department of
24 Education.

25 Q Did Mr. Jones attend this LEA collaborative

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
197

1 meeting?

2 A I believe so, yes.

3 Q Did anyone else from the State Department of
4 Education attend the collaborative meeting?

5 A I believe Vickie Cleveland was there and I'm
6 not sure who else.

7 Q You note in your email that you would prepare
8 a presentation for the collaborative. Did you do that?

9 A I did.

10 MS. GARDNER: I'd like to ask that this
11 document be marked as Plaintiff's Exhibit 491.

12 (Plaintiff's Exhibit 491 was marked for
13 identification.)

14 (Witness reviewing document.)

15 BY MS. GARDNER:

16 Q Ms. Wolf, you have been handed what's been
17 marked as Plaintiff's Exhibit 491. This is an email
18 from you to Nakeba Rahming dated November 16, 2017.
19 Vickie Cleveland is also included in this email and the
20 subject is "PowerPoint for LEA Collaborative
21 December 7th on Consideration of Services."

22 There are several attachments to this email
23 that are consideration of services forms. The Bates
24 stamp on the first page of this document is GA00013170.

25 Do you recognize this email?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
198

1 A I do.

2 Q In this email, do you provide to Ms. Rahming
3 and Ms. Cleveland the presentation that you indicated
4 you would prepare for the LEA collaborative meeting?

5 A Yes.

6 Q I want to take a look at Page 3 of that
7 presentation. This slide is titled Roll Out, correct?

8 A Correct.

9 Q Then beneath that it says, "Fall of 2018" and
10 it also says, "Some programs to pilot beginning in
11 January of this year."

12 Do you see that?

13 A Yes.

14 Q Were the consideration of services forms
15 piloted by some GNETS programs before they were fully
16 rolled out in the fall of 2018?

17 A Yes.

18 Q That pilot began in January of 2018?

19 A Yes.

20 Q How many programs participated in the pilot?

21 A I don't recall.

22 Q Did GNETS of Oconee participate?

23 A Yes.

24 Q What happened after the initial pilot phase?

25 A After the pilot phase, we came, I believe we

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022

199

1 came back together again in the summer and just went
2 through everything again with the directors. And that
3 was our rollout in the fall.

4 Q Were there changes made to the consideration
5 of services form between the end of the pilot phase and
6 when they were rolled out in the fall of 2018?

7 A I believe there was just some minor changes in
8 typos and formatting and things like that.

9 MS. GARDNER: I'd like to ask that this
10 document be marked as Plaintiff's Exhibit 492.

11 (Plaintiff's Exhibit 492 was marked for
12 identification.)

13 (Witness reviewing document.)

14 BY MS. GARDNER:

15 Q Ms. Wolf, you have been handed Plaintiff's
16 Exhibit 492. This is an email thread between Nakeba
17 Rahming, you, Whitney Braddock, Steve Derr and Vickie
18 Cleveland. The most recent email in the thread is an
19 email from Ms. Rahming to you, Steve Derr, Whitney
20 Braddock and Vickie Cleveland. The subject is "Re:
21 Consideration of Services - Revised" and that's sent on
22 December 11, 2017. The Bates stamp on the first page
23 of this document is GA00014016.

24 Do you recognize this email thread?

25 A Yes.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
200

1 Q I want to start at the bottom with the email
2 from you to Steve Derr, Whitney Braddock and Nakeba
3 Rahming. In it you say, "I wanted you each to take a
4 look at the consideration of services student
5 information packet based on the discussion yesterday
6 about insuring that the EBD part is removed. Please
7 review the highlighted area and let me know what you
8 think. Should we keep in those 45 criteria and just
9 not mention EBD or take that part out completely?"

10 Do you see that?

11 A Yes.

12 Q What was the discussion about ensuring the EBD
13 part is removed?

14 A There were several GNETS programs that have
15 served other disabilities, and it was felt that it was,
16 placement consideration was up to the IEP team. So
17 they felt that the disability of EBD should be removed.

18 Q Had that been included in a form as criteria?

19 A I believe so, yes.

20 Q So in your email, you are inquiring whether
21 you should keep certain criteria that support the
22 characteristics of EBD but just not mention EBD
23 specifically?

24 A Correct.

25 Q Nakeba Rahming responds to your email. In

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
201

1 here she says, "I do like the new version and the
2 bullets that support the characteristics of EBD."

3 Do you see that?

4 A Yes.

5 Q What was the ultimate conclusion on this
6 question?

7 A That I believe that we would keep out the EBD
8 and allow, ensure that the IEP teams are coming up with
9 the decision if someone that is not, doesn't have the
10 disability of EBD, that they can still benefit from our
11 program.

12 Q Did you keep in the criteria that supported
13 the characteristics of EBD?

14 A I believe we did, yes.

15 MS. GARDNER: I'd like to have this marked as
16 Plaintiff's Exhibit 493.

17 (Plaintiff's Exhibit 493 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q Ms. Wolf, you have been given Plaintiff's
22 Exhibit 493. This is an email from you to Vickie
23 Cleveland dated June 20, 2018 with the subject
24 "Finalized Consideration of Services Forms." It
25 contains several attachments, the GNETS Confidential

1 Student Information Packet as of June 20, 2018; the
2 GNETS Request for Consultation as of June 20, 2018; the
3 GNETS Services Flow Chart; and Guidance for GNETS
4 Placements as of June 20, 2018. The Bates stamp on the
5 first page of this document is GA00327280.

6 Do you recognize this email?

7 A I do.

8 Q Am I correct that in this email you write to
9 Vickie, "I made all of the changes we discussed
10 yesterday regarding the Consideration of Services
11 forms. Please have the DOE attorney look them over and
12 let me know if changes need to be made. When I get the
13 go-ahead from you, I will post them on the GNETS
14 director's notebook."

15 Is that right?

16 A Correct.

17 Q What's the GNETS director's notebook?

18 A The GNETS director's notebook was a
19 centralized resource for GNETS directors where they can
20 access the rule, these forms, any resources shared
21 among our programs. It was on Microsoft 365,
22 director's notebook, but it wasn't really utilized the
23 way we had intended, so.

24 Q When you say it wasn't utilized in the way you
25 had intended, what do you mean by that?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
203

1 A We just -- it kind of fizzled out. It wasn't
2 something that was around for very long.

3 Q Was it the equivalent of like a Sharepoint
4 site, something like that?

5 A Yes.

6 Q So the time that you sent this email, this
7 would have been after the pilot phase for the
8 consideration of services forms had ended?

9 A Correct.

10 Q Did the DOE attorney look the documents over
11 as you requested?

12 A I don't know.

13 MS. GARDNER: I'd like to have this marked as
14 Plaintiff's Exhibit 494.

15 (Plaintiff's Exhibit 494 was marked for
16 identification.)

17 (Witness reviewing document.)

18 BY MS. GARDNER:

19 Q You have been handed Plaintiff's Exhibit 494.
20 This is an email from you to Vickie Cleveland dated
21 June 21, 2018 with the subject "Consideration." The
22 Bates Stamp on this email is GA00327446.

23 Am I correct that here you are following up
24 with Ms. Cleveland to request that she let you know
25 when, quote, "legal has reviewed the consideration

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
204

1 forms"?

2 A Correct.

3 Q And here you say, "Directors are chomping at
4 the bit to get them"?

5 A Correct.

6 Q Correct that you were waiting to release the
7 consideration of services forms to the GNETS directors
8 until you heard that legal had reviewed those forms?

9 A Yes.

10 Q By legal here, you are referencing the
11 Department of Education's attorneys?

12 A Yes.

13 Q The State Department of Education's attorneys?

14 A Correct.

15 MS. GARDNER: I'd like to have this marked as
16 Plaintiff's Exhibit 495.

17 (Plaintiff's Exhibit 495 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q You have been handed Plaintiff's Exhibit 495.
22 This is an email from you dated July 16, 2018. The
23 subject is "Consideration of Services Forms Are Ready."
24 It is sent to a distribution list of various folks and
25 the Bates stamp on the first page of this document is

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
205

1 GA00328367.

2 This is an email from you to the other GNETS
3 directors; is that correct?

4 A Yes.

5 Q Am I correct that in this email you are
6 relaying to them that Vickie Cleveland has given you
7 the go ahead for the consideration of services forms?

8 A Yes.

9 Q So you heard back from Ms. Cleveland and she
10 said that you could release the consideration of
11 services forms to the other GNETS directors?

12 A Yes.

13 Q In here you note that those forms could be
14 found on the GNETS directors' notebooks, correct?

15 A Correct.

16 Q To what extent have the consideration of
17 services forms that you provided at this time been
18 changed from 2018 to now?

19 A Very minor changes, and I believe in one case
20 there was some demographic data that was inadvertently
21 left off. And so that was included. Minor changes.

22 Q When those minor changes have been made, are
23 the forms updated to reflect kind of the date that they
24 were updated?

25 A I don't believe so.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
207

1 A Yes.

2 MS. GARDNER: I'd like to have this document
3 marked as Plaintiff's Exhibit 496.

4 (Plaintiff's Exhibit 496 was marked for
5 identification.)

6 (Witness reviewing document.)

7 BY MS. GARDNER:

8 Q You have been handed Plaintiff's Exhibit 496.
9 This is an email from you to Nakeba Rahming sent on
10 January 17, 2017. The subject is Final Recommended
11 Agenda and there is one attachment to the email which
12 is a Word document with the file name GNETS Director's
13 Meeting Final Agenda 1-24 to 25-2017. The Bates stamp
14 on the first page of this document is GA00130964.

15 Do you recognize this document?

16 A Yes.

17 Q Is this email discussing the agenda for an
18 upcoming GNETS directors meeting?

19 A Yes.

20 Q You say early in the email, you write,
21 "Nakeba, We (Najma, Desiree, Kerri and I) met and
22 recommend that we hear from you with updates on the
23 first day instead of the second day to give you more
24 time with updates and questions."

25 Do you see that?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
208

1 A Yes.

2 Q Were you, Najma, Desiree and Kerri members of
3 some sort of committee?

4 A Yes.

5 Q What committee was that?

6 A I can't remember if it was the professional
7 learning or executive committee. I think it was
8 executive committee.

9 Q So as of January 2017, you were on the GNETS
10 executive committee?

11 A Yes.

12 Q Prior to you sending this email, y'all had
13 gotten together and put together a recommended agenda
14 for the upcoming GNETS directors meeting?

15 A Yes.

16 Q You mention in the question that's identified
17 as Number 2 in this email, it says, "Directors would
18 like a followup question and answer session from you on
19 the following to review the expectations for the
20 remainder of the year for our mandated interventions."

21 Do you see that?

22 A Yes.

23 Q It says, "Please also reiterate due dates,"
24 and goes on to say, "What are the next steps for each
25 of these areas?" Those areas that are listed include

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
209

1 iReady, BASC-3/Flex Monitoring, SDQ, FBA/BIP and Trauma
2 Informed Care.

3 Do you see that?

4 A Yes.

5 Q Is this list beginning with iReady, the
6 mandated interventions that you are referring to in
7 this section?

8 A Yes.

9 Q Those were mandated interventions for GNETS
10 programs?

11 A Yes.

12 Q Who mandated those particular interventions?

13 A I believe Nakeba Rahming.

14 Q So some of these we have discussed already. I
15 think you told me a little bit earlier about iReady,
16 correct?

17 A Correct.

18 Q What is BASC-3/flex monitoring?

19 A So BASC-3 is the Behavior Assessment System
20 for Children, Version 3. The flex monitoring is part
21 of the BASC. It is a different assessment that's more
22 of a progress monitoring tool. So the BASC is a tool
23 that teachers would fill out to determine the level of
24 behavior intensity for student behaviors and emotional
25 needs.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
210

1 Q What about the SDQ?

2 A The SDQ is a Strength Difficulties
3 Questionnaire and it is a screener to basically
4 identify difficulties that students may have in
5 behaviors, relationships with others, emotional needs.
6 So it is a general screener to see where students are,
7 whether at low risk for behavior disorder, emotional
8 disorder or if they are at a high risk. And the
9 student and teacher and parent fills that out.

10 Q FBA, that's Functional Behavioral Assessment
11 and Behavior Intervention Plan?

12 A Yes.

13 Q In what ways were those mandated
14 interventions?

15 A So the mandate was that with GNETS students,
16 that they should have a functional behavior assessment
17 done every year by GNETS, and that feeds the behavior
18 intervention plans, to see if it needs to be updated or
19 changed.

20 Q The last one here, trauma-informed care, what
21 is that?

22 A Having, ensuring that all of our staff are
23 trained in trauma-informed care across the board.

24 Q Turning to the actual agenda that you attached
25 to the email, this agenda on day two says that from ten

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
213

1 things you used the portal for and you were discussing
2 the GNETS grant application and the therapeutic
3 services log.

4 A Yes.

5 Q You also mentioned that you would use the
6 portal to communicate secure information on students to
7 the State Department of Education?

8 A Correct.

9 Q I'm wondering what kind of secure information
10 on students were you referring to?

11 A If they require us to send any student
12 information that would have their GTID or any personal
13 identifiers on there, then we would have to send it
14 through the portal.

15 MS. GARDNER: I'd like to have this document
16 marked as Plaintiff's Exhibit 497.

17 (Plaintiff's Exhibit 497 was marked for
18 identification.)

19 (Witness reviewing document.)

20 BY MS. GARDNER:

21 Q You have been handed Plaintiff's Exhibit 497.
22 This is an email thread between you and Nakeba Rahming.
23 The most recent email in the thread is an email from
24 you to Nakeba Rahming on November 18, 2016 with the
25 subject "Re: Four-year-olds." The Bates Stamp on the

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
214

1 first page of this document is GA00042505.

2 Do you recognize this email thread?

3 A Yes.

4 Q I want to start with the earliest in time
5 email which appears on the second page. Am I correct
6 that you wrote to Nakeba Rahming saying that you had a
7 four-year-old not turning five until May and you write,
8 "Since the new rule isn't in effect, can we serve him
9 in our GNETS classroom? Just making sure."

10 Do you see that?

11 A Yes.

12 Q When you say the new rule isn't in effect,
13 what rule are you referring to?

14 A Just the GNETS rule.

15 Q Am I correct in understanding that there was a
16 new GNETS rule that eventually went into effect in
17 2017?

18 A Yes.

19 Q Is that the rule that you are speaking of at
20 this time?

21 A Yes.

22 Q It hadn't yet been enacted?

23 A Correct.

24 Q Since it hadn't yet been enacted, you were
25 asking Ms. Rahming if you could serve a four-year-old

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
215

1 at GNETS of Oconee?

2 A Yes.

3 Q Was it your understanding that the new rule
4 would prevent a student that age from being served in
5 GNETS?

6 A It was.

7 Q At the time you made this inquiry, were you
8 already serving the four-year-old or was this a new
9 student?

10 A I can't recall.

11 Q What was Ms. Rahming's response to you?

12 A She responded, "That's correct. The new age
13 will not take effect until the new rule is initiated."

14 Q So she confirmed that GNETS of Oconee could
15 serve a four-year-old because the new rule hadn't yet
16 taken effect?

17 A Correct.

18 Q Did GNETS of Oconee serve that four-year-old
19 you were writing about?

20 A I believe so, yes.

21 MS. GARDNER: I'd like to have this marked as
22 Plaintiff's Exhibit 498.

23 (Plaintiff's Exhibit 498 was marked for
24 identification.)

25 (Witness reviewing document.)

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
216

1 BY MS. GARDNER:

2 Q You have been handed Plaintiff's Exhibit 498.
3 This is an email thread involving Nakeba Rahming, you
4 and Brooke Cole. The most recent email is from Nakeba
5 Rahming to you with a copy to Brooke Cole dated
6 August 2, 2016. The subject is "Re: Jasper County,"
7 and the first page of this document is Bates stamped
8 GA00781443.

9 Do you recognize this email thread?

10 A I do.

11 Q If you look at the bottom of the page, the
12 first in time email, am I correct that you reach out to
13 Ms. Rahming on August 1, 2016 and you say, "Good
14 evening, Nakeba. Can Elam Alexander Academy serve
15 Jasper County students even though Jasper County falls
16 under GNETS of Oconee catchment?"

17 A Yes.

18 Q What prompted this question?

19 A Jasper County wanted to serve a student at
20 Elam Alexander Academy.

21 Q Is this the same student we discussed earlier?

22 A I believe so, yes.

23 Q That was a student that you said was
24 physically aggressive and there was some discussion
25 about whether that student would be better served at

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
217

1 Elam Alexander?

2 A Yes.

3 Q What was Ms. Rahming's response to you?

4 A She said that Jasper County is in the
5 catchment area the for Oconee GNETS program and that
6 students will need to receive services in their service
7 area by the Oconee program or their local school
8 district.

9 And then another concern would be the
10 distance. Jasper County students would need to travel
11 to receive services at Elam.

12 Q So Ms. Rahming told you and Ms. Cole that Elam
13 Alexander could not serve Jasper County students,
14 right?

15 A That's correct.

16 Q Once a student arrives at GNETS of Oconee, are
17 they given any assessments to determine where they are
18 behaviorally?

19 A Not initially. Initially the parent is given
20 the strengths/difficulties questionnaire. If the
21 student is 11 to 17, they are given the
22 strengths/difficulties questionnaire so we can gauge
23 what the parent thinks. But we wait, we wait for a
24 period of time until we administer any behavioral
25 assessments because there is usually a honeymoon-type

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
219

1 BY MS. GARDNER:

2 Q Ms. Wolf, you have been handed Plaintiff's
3 Exhibit 499. This is an email from you to Vickie
4 Cleveland dated June 14, 2018. The subject is
5 Suggestion and it includes one attachment which is a
6 pdf with the file name GNETS 2017-2018 Screening,
7 Diagnostic and PL Calendar. The Bates stamp on the
8 first page of this document is GA00326222.

9 Do you recognize this email?

10 A I do.

11 Q Am I correct that in this email you write to
12 Vickie and you say, "Last year Nakeba gave us a
13 calendar giving us all the dates for the year and this
14 is extremely helpful."

15 Is that right?

16 A Yes.

17 Q You provide that calendar that you say Ms.
18 Rahming provided in your email to Ms. Cleveland,
19 correct?

20 A Yes.

21 Q When you say, "Last year Nakeba gave us a
22 calendar," who is the us referring to?

23 A The GNETS directors.

24 Q What was the purpose of the attached calendar
25 when Ms. Rahming gave it to you and the other GNETS

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
220

1 directors?

2 A It gives directors an overview of when the
3 different interventions and assessments are due as well
4 as the grant proposal which is all the responsibilities
5 throughout the year.

6 Q Did Ms. Rahming create that calendar?

7 A I can't remember if she created it or I
8 created it, this particular one.

9 Q What prompted you to send the calendar to Ms.
10 Cleveland?

11 A With Ms. Cleveland taking over the position
12 for Ms. Rahming, we felt we needed to have a calendar
13 so we would know what the expectations are for the
14 coming year.

15 Q So if you turn to the calendar, the first page
16 of the calendar is August 2017, correct?

17 A Correct.

18 Q Am I correct that this shows that iReady
19 diagnostic begins on August 7th?

20 A Yes.

21 Q And iReady diagnostic ends on September 15,
22 2017?

23 A Yes. It kind of goes through the whole month
24 of August, it looks like.

25 Q Right. So if you turn to the next page on

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
221

1 September 15, 2017, it says, "iReady diagnostic ends"?

2 A Yes.

3 Q So this calendar would let GNETS directors
4 know that August 7th to September 15th was the window
5 that programs had to administer the iReady diagnostic
6 to GNETS students?

7 A Yes.

8 Q Am I correct that on the August 2017 page of
9 the calendar, there are also instructions for how to
10 use the iReady diagnostics?

11 A Yes.

12 Q If you turn to October 2017, am I correct that
13 the October and November 2017 calendars show the window
14 for GNETS programs to administrator the SDQ tests?

15 A Yes.

16 Q That window was October 16th to November 3rd?

17 A Yes.

18 Q The November 2017 calendar page also shows the
19 window for GNETS programs to administer the BASC-3; is
20 that right?

21 A Correct.

22 Q Am I correct that on the October 2017 calendar
23 page, there are instructions for conducting emotional
24 and behavioral screening?

25 A Yes.

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
222

1 Q Those instructions tell how the SDQ and the
2 BASC-3 should be used, among other things?

3 A Yes.

4 Q This calendar that you attach in your email to
5 Ms. Cleveland contains other dates for other
6 assessments and for professional learning, correct?

7 A Correct.

8 Q It also includes the dates for when GNETS
9 programs should complete their midyear strategic plan
10 self-assessment?

11 A Yes.

12 Q And their end of year strategic plan
13 self-assessment?

14 A Correct.

15 Q It also includes the window for when visits
16 for the strategic plan reviews begin and end; is that
17 right?

18 A Yes.

19 Q Did Ms. Cleveland enlist your help in updating
20 this calendar after you sent it to her so that it could
21 be used for the upcoming 2018-2019 school year?

22 A I do not recall.

23 MS. GARDNER: I'd like to have this marked as
24 Plaintiff's Exhibit 500.

25 (Plaintiff's Exhibit 500 was marked for

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
224

1 Q When did you last receive a calendar like
2 this?

3 A I believe that was the last year we received a
4 calendar.

5 Q Do you still operate on a schedule for
6 administering iReady diagnostics?

7 A Yes.

8 Q How do you know the window for administering
9 iReady diagnostics?

10 A I'm not sure if we get -- I think when we have
11 our directors meetings, those dates are posted in the
12 PowerPoint but it's not given in a calendar format that
13 I have seen.

14 Q But you receive it through the GNETS directors
15 meetings?

16 A Yes.

17 Q Do you still operate on a schedule for
18 administering the SDQ?

19 A Yes.

20 Q Do you still operate on a schedule for
21 administering the BASC-3?

22 A Yes.

23 Q Do you receive the dates for administering the
24 SDQ and the BASC-3 similarly in GNETS directors
25 meetings?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
225

1 A Yes.

2 Q Who do those dates come from?

3 A Vickie Cleveland and Lakeisha Stevenson.

4 Q Does GNETS of Oconee submit its SDQ results to
5 the Georgia Department of Education?

6 A We do not submit them, no. We keep them as
7 part of our strategic plan artifacts.

8 Q Those strategic plan artifacts are reviewed --
9 let me rephrase that. Are those strategic plan
10 artifacts reviewed at any point in the strategic plan
11 and self assessment process?

12 A Yes.

13 Q Who reviews those artifacts?

14 A We review them at a GNETS local level with our
15 leadership team and they are available should the State
16 want to come in and review our artifacts for the
17 strategic plan.

18 Q Was there a time when GNETS of Oconee
19 submitted its SDQ results to the Georgia Department of
20 Education?

21 A I do not recall.

22 MS. GARDNER: I'd like to have this marked as
23 Plaintiff's Exhibit 501.

24 (Plaintiff's Exhibit 501 was marked for
25 identification.)

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
238

1 A I don't know the exact amount.

2 Q Ballpark?

3 A Ballpark, I really don't, I don't even know,
4 like 250,000. I'm not really sure.

5 Q You think it's about 250,000?

6 A I really don't know. I'm sorry.

7 Q Are you familiar with the GNETS strategic
8 plan?

9 A Yes.

10 Q What is the GNETS strategic plan?

11 A The GNETS strategic plan is basically a
12 program improvement plan where there are several
13 components that we put in place, academic, behavioral,
14 fiscal, supervision-wise that we put in place and
15 ensure that all those elements are carried out.

16 Q Is GNETS of Oconee obligated to comply with
17 the GNETS strategic plan?

18 A We are.

19 Q Does the strategic plan have an assessment
20 component?

21 A In each of the areas, yes, it does.

22 Q How does the assessment process work
23 generally?

24 A So in terms of the academic part, there's an
25 assessment required for state-mandated assessment. Of

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
241

1 with Lakeisha Stevenson.

2 MS. GARDNER: I'd like to have this marked as
3 Plaintiff's Exhibit 503.

4 (Plaintiff's Exhibit 503 was marked for
5 identification.)

6 (Witness reviewing document.)

7 BY MS. GARDNER:

8 Q Ms. Wolf, you have been handed what's been
9 marked as Plaintiff's Exhibit 503. This is an email
10 thread between you and Deborah Gay. The most recent
11 email in the thread, you sent to Deborah Gay on
12 December 31, 2015. The subject is As Requested.

13 It contains one attachment which is a
14 Microsoft Word document with the file name GNETS
15 Strategic Plan Year 4 Recommendations from Wolf. The
16 first page of this document is Bates stamped 00403823.

17 Do you recognize this?

18 A I do.

19 Q Am I correct that you are sending this email
20 in response to a prior email from Ms. Gay and what she
21 says, "I would appreciate your review of the attached
22 updated GNETS strategic plan for accuracy and to
23 include any additional information you may have."

24 A Yes.

25 Q Who is Deborah Gay?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
242

1 A Deborah Gay was the director of the special
2 education services and support for the Department of
3 Education and that was in 2015.

4 Q In your email you say you highlighted your
5 recommendations in yellow and put some comments in red
6 in the strategic plan that you attach in your email to
7 Ms. Gay?

8 A Yes.

9 Q Turning to the attachment, turn to Page 3 of
10 the attachment which has the section on program
11 operation on it.

12 A Yes.

13 Q Do you see it says just beneath that, "The
14 GaDOE provides to each GNETS program, GNETS fiscal
15 agent, local school district, and other stakeholders a
16 GNETS program operations manual that clearly describes
17 program responsibilities and fiscal operations."

18 A Yes.

19 Q "This manual is designed to ensure that GNETS
20 programs operate efficiently, effectively and
21 consistently throughout the network to support local
22 school districts in providing students with educational
23 opportunities that will enable them to become college
24 and career ready."

25 Do you see that?

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
243

1 A I do.

2 Q As director of the GNETS program, did you
3 receive one of the operations manuals referenced here?

4 A Yes.

5 Q Do you still receive such operations manuals?

6 A The operations manual is online. It hasn't
7 been updated for a number of years.

8 Q Do you still refer to the operations manual in
9 any way?

10 A I don't, no.

11 Q If you turn to the next page, Page 4, just
12 above Goal 2 it says, "GaDOE will collaborate with
13 interagency partners (i.e., the Department of
14 Behavioral Health and Developmental Disabilities) to
15 ensure that eligible GNETS students have access to
16 mental health services through a system of care."

17 Do you see that?

18 A Yes.

19 Q What did you understand this to mean?

20 A That our students would benefit from the
21 system of care and ensuring that they are getting the
22 highest level of services needed.

23 Q What is the system of care?

24 A It is a system of different agencies and
25 service providers that are available in the community

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
249

1 plan."

2 A Yes.

3 Q Who is Jeannie Morris?

4 A Jeannie Morris was a fellow GNETS director
5 from the Cedarwood Academy.

6 Q When you say that the attached draft rubric
7 addresses each of the standards of practice, what
8 standards of practice are you referring to?

9 A So at that time we had standards of practice
10 of what was recommended for each GNETS program to have
11 for their program accountability measures.

12 Q Were those standards of practice first
13 identified in the draft rubric or did they preexist the
14 rubric?

15 A They preexisted the rubric.

16 Q When were those standards of practice
17 developed?

18 A It's hard to say. It was a couple of years
19 before this, so we're talking around 2010 maybe.

20 Q Who developed the standards of practice?

21 A We developed them as GNETS directors.

22 Q Did the State Department of Education
23 participate in that process?

24 A I believe so.

25 Q If you recall, who from the State Department

PATRICIA J. WOLF
UNITED STATES vs STATE OF GEORGIA

October 06, 2022
250

1 of Education was involved?

2 A I don't recall specifically who was involved
3 with the standards of practice. Terry, what was
4 Terry's last name, he was the prior GNETS program
5 manager. Susan Mackenzie, it's been a while ago. So
6 prior to Virginia O'Connell.

7 Q I want to take a look at the attached rubric.
8 Am I correct in understanding that the rubric
9 identifies the various standards of practice along the
10 far left column?

11 A Yes.

12 Q And that it contains indicators for how well a
13 GNETS program is demonstrating that standard of
14 practice; is that right?

15 A That's correct.

16 Q So a GNETS program can either be in the
17 efficient category, the needs development category or
18 the ineffective category?

19 A Correct.

20 Q For each standard of practice, there are
21 indicators identified that would tell someone where a
22 GNETS program faults on the scale of proficient, needs
23 development or ineffective, right?

24 A Correct.

25 Q So, for example, on the first page of the